

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

RAJENDA BADGAIYAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.:
	)	04-12031-JLT
	)	
ANTHONY J. PRINCIPI,	)	
PRESIDENT AND FELLOWS OF	)	
HARVARD COLLEGE, AND	)	
GRACE MUSHRUSH, M.D.,	)	
	)	
Defendants.	)	
	)	
	)	

**JOINT MOTION TO EXTEND DISCOVERY TO FEBRUARY 23, 2006**

The parties in this action submit the following Joint Motion to Extend Discovery to February 23, 2006. As grounds for this Motion the parties state as follows:

1. The parties were before the Court on September 14, 2005, and provided the Court with a list of individuals to be deposed. The parties identified approximately 12 individuals;
2. The Court allowed the parties to depose these individuals and set a date of January 31, 2006 as a deadline for depositions;
3. Counsel for the Government is scheduled to commence a trial on January 23, 2006 before the Honorable Patti B. Saris. Given the anticipated length of the trial, the parties will be hard pressed to complete the depositions prior to January 31, 2006;

WHEREFORE, given the above, the parties respectfully move this Court for an extension of time to February 28, 2006 to complete depositions.

Respectfully submitted,

RAJENDA BADGAIYAN, M.D.,

ANTHONY J. PRINCIPI, SECRETARY  
OF THE DEPT. OF VETERANS  
AFFAIRS,

By its Attorneys,

MICHAEL J. SULLIVAN  
United States Attorney

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President and Fellows  
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**LOCAL RULE 7.1 CERTIFICATION**

I, Rayford A. Farquhar, Assistant United States Attorney, do hereby state that on January 4, 2006, I spoke with Attorneys Paul H. Merry and Daniel S. Field and they assented to the filing of this Motion.

/s/ Rayford A. Farquhar  
Rayford A. Farquhar  
Assistant U.S. Attorney